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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

WORLD FUEL SERVICES
(SINGAPORE) PTE LTD,

Plaintiff,

v.

M/V PORT STAR, IMO # 9583237, *in rem*

Defendant.

IN ADMIRALTY

Case No.

DECLARATION OF ERIC KASTNER IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPOINTMENT OF SUBSTITUTE
CUSTODIAN

I, Eric Kastner, am the President of Cascade Marine Agencies, Ltd., a Washington corporation headquartered in Vancouver, Washington ("CMA"), and declare that:

Page 1 - Declaration of Eric Kastner in Support of Plaintiff's Motion for Appointment of Substitute Custodian

1. I am familiar with the M/V POT STAR (the "Vessel"), described in the Verified Complaint accompanying this Declaration, at least to the extent of her size, type, construction material, and general usage, and attest that CMA can provide adequate supervision for, and can safely keep, the Vessel in place of the U.S. Marshal during the pendency of this action and until further order of the Court; and, in this regard, CMA would exercise due care to preserve and protect the Vessel during the custodianship.

2. CMA is a professional ship's agent whose business is regularly dealing with vessels like the M/V PORT STAR when they are in port in Oregon and Washington. CMA has also acted as a vessel substitute custodian in the District of Oregon on a regular basis, at least since 1988, being approved by the Court and the U.S. Marshal in numerous cases.

3. As the appointed Substitute Custodian of the Vessel, CMA will:

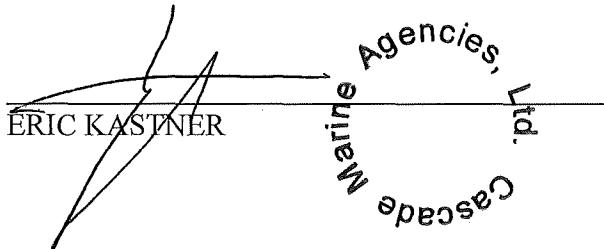
- a. Attend the Supplemental Rule C arrest of the Vessel with the U.S. Marshal;
- b. Immediately assume the Substitute Custodianship of the Vessel from the Marshal;
- c. Conduct an inventory of the Vessel by confirming and recording the location of personal property, equipment, fixtures, and appurtenances on board the Vessel;
- d. Oversee any movement of the Vessel from its current location to a more suitable anchorage or mooring within the District, should the Court subsequently make such an Order;
- e. Be responsible for the safekeeping of the Vessel during the pendency of this action while it is in CMA's custodianship; and
- f. Comply with all Orders of this Court regarding the Vessel and CMA's custodianship of the Vessel.

4. CMA charges an arrest fee of \$1,000.00, plus a fee for a launch to access the Vessel of approximately \$750.00, and will perform the services listed above as substitute custodian for the Vessel at a charge of \$100.00 per day, together with any incurred and potentially expected expenses such as launch services and travel. CMA will seek Court approval of any extraordinary expenses relating to its substitute custodianship of the Vessel.

5. I understand that liability insurance for CMA will be maintained through the insurance of the U.S. Marshal.

6. CMA agrees to accept substitute custodianship of the Vessel in accordance with the Order Appointing Substitute Custodian.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this Declaration was executed on March 15, 2019, in Vancouver, Washington.



ERIC KASTNER

Cascade Marine Agencies, Ltd.